



STATEMENT OF AT&T CONNECTICUT

Regarding Raised Senate Bill No. 179 An Act Requiring Continual 911 Service Before the Committee on Energy and Technology February 23, 2010

Proposal:

Raised Senate Bill No. 179 would require a telephone company or certified telecommunications provider to continue to provide E-911 service to a customer who is having their service terminated for non-payment.

Comments:

AT&T Connecticut is opposed to Raised Senate Bill No. 179 and urges the committee to reject it.

As written, the proposal before this committee would subject AT&T Connecticut and Verizon in one-half of the town of Greenwich and a small handful of our competitors to extremely onerous and expensive requirements which would not be imposed onto our biggest competitors – that is wireless companies and companies using VoIP technology which includes all of the state's cable TV companies that offer voice services. Today, AT&T Connecticut provides local phone service to about one-half of the state's homes. The other one-half is provided by either VoIP providers or are wireless-only households. So in effect, this legislation would not even cover one-half of the state's population. In addition, because of federal preemptions, the legislature could not extend these requirements to VoIP or wireless companies. The regulatory playing field between traditional phone companies like AT&T and companies utilizing VoIP technology is already very tilted in favor of VoIP providers who face little if any state regulation. This legislation would only exacerbate the inequitable treatment of competing services.

While well intentioned, this legislation is unnecessary. Telephone companies have not been providing this continuation of E-911 services today and there is little if any evidence that any harm has occurred as a result. In addition, the widespread adoption of wireless services by the state's consumers has put an emergency "lifeline" in the hands of virtually anyone who needs it. According to the FCC, as of June 2008 there were more than 2.9 million wireless subscribers in the state – well more than one for every household. In addition, there are more than one million more wireless subscribers in the state than there are traditional telephone lines. Finally, every wireless phone, whether someone is subscribed to service or not, will connect a user to 911 when that number is dialed. That is why various social service agencies, like shelters for battered women, collect unwanted cell phones so that they can be used as a 911 device by their clients.

There are real costs associated with providing a 911 connection. In fact, AT&T would incur all of the same charges to keep a line up and running just for purposes of providing 911

service as it would for any other line. In addition, companies subject to this requirement would actually have to incur costs over and above those for its regular customers as companies would have to program their switches and place restrictions on those lines which continue to exist only for purposes of providing 911 service.

AT&T's billing practices and programs it has in place to help provide low cost service to needy customers are more than appropriate to ensure that a customer can have service if they need it. AT&T does not disconnect customers' basic services so long as they are paying only those charges related to basic residential service. If for some reason a customer falls behind on the non-basic portion of their bill – for things like long distance or vertical calling features like caller-ID for example – AT&T suspends those services but continues to provide local exchange service so long as the customer is paying the nominal charges for basic exchange service. In addition, AT&T has a "lifeline" credit available to consumers to use towards their basic charges. This lifeline credit is equal to \$7.00 a month and if a consumer is eligible for any of the state's assistance programs than they can qualify to receive a "lifeline" credit. Finally, AT&T has a process in place, pursuant to Connecticut General Statute section 16-262d(b), in which a subscriber who has obtained a doctor's certificate when someone in the household is seriously ill has the opportunity to enter into payment arrangements and avoid termination. This clearly protects someone who might need 911 for a medical emergency.

Conclusion:

AT&T opposes Raised Senate Bill No. 179 and urges the committee to reject it.